

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

UNITED STATES OF AMERICA

JAN 17 2008

V.

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MJM DEPUTY CLERK

SAULO REYES-GAMBOA

) NO.
08-277-m

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant is charged with a violation of the Controlled Substances Act which carries a term of imprisonment of over ten (10) years.
2. The Defendant was arrested with approximately 985.16 pounds of marijuana.
3. The Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

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